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Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

J.S. and S.S., on behalf of
A.S.,

Plaintiffs,

v.

WEST MORRIS REGIONAL HIGH
SCHOOL DISTRICT BOARD OF
EDUCATION.

Defendant.

Civil Action

Case No. 2:22-00561-EP-ESK

**MOTION FOR ENTRY OF DEFAULT
JUDGMENT**

Plaintiffs, J.S. and S.S., on behalf of A.S., hereby move before the Honorable Evelyn Padin, U.S.D.J., at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Room 4C, Newark, NJ 07102, for a default judgment in favor of Plaintiffs and against Defendant, WEST MORRIS REGIONAL HIGH SCHOOL DISTRICT BOARD OF EDUCATION, ordering that Defendant comply with Plaintiff A.S.'s stay-put IEP by providing her the curb-to-curb transportation included therein by picking her up and dropping her off in front of her home when transporting her to and from school during the pendency of the special education

due process hearing regarding the parties' underlying transportation dispute presently before the New Jersey Office of Administrative Law.

This motion is made on the ground that Defendant, WEST MORRIS REGIONAL HIGH SCHOOL DISTRICT BOARD OF EDUCATION, has failed to appear in this action, and that the time allowed for appearance has expired.

This motion is based on the Verified Complaint (ECF 1), the Brief (ECF 1-6) and Appendix of the OAL Stay Put Hearing Records (ECF 1-8 and 1-9) filed in Support of Plaintiffs' application for an order to show cause, and the Certification of David R. Giles, attorney for Plaintiff, filed herewith.

Dated: July 6, 2022

s/David R. Giles
Attorney for Plaintiffs